



Sacco & Fillas, LLP
Attorneys at Law

31-19 Newtown Avenue
Seventh Floor
Astoria, NY 11102

Tel: 718 746-3440
Direct: 718 269-2240
Direct Fax: 718 425-9752

Plynch@saccofillas.com
www.saccofillas.com

Tonino Sacco*
Elias N. Fillas
Luigi Brandimarte*

Elizabeth A. Athenas
James R. Baez*
Alexander Berger*
Boris Bernstein*
Eric S. Cantor
Joanne Ciaramella
Christopher P. DelGioppio*
Ronald B. Groman
Zachary S. Kaplan
Joseph Katz
Hariharan Krishnaraj
Evan R. Levtow
Elliot L. Lewis
Patricia R. Lynch
Albert R. Matuza, Jr.
Lamont K. Rodgers
Richard E. Schirmer
Jared Scotto
David E. Silverman
Cindy S. Simms
U. William Sung
Angel R. Vitiello
Michael S. Warycha
Dana M. Whitfield
James A. Wolff

*Also admitted in New Jersey

Bayside Office:

42-40 Bell Boulevard
Suite 301
Bayside, NY 11361

VIA ECF

January 7, 2022

The Honorable Brian M. Cogan
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Kliti v. Stay Fresh Grill II Corp., et al.
Docket No.: 1:21-cv-06363-BMC

Dear Judge Cogan:


I represent the Plaintiff in the referenced action. I submit this letter pursuant to Your Honor's Scheduling Order dated November 17, 2021.

This letter is not being filed jointly with the Defendants, because the Defendants have not yet appeared in this matter. The corporate defendant, Stay Fresh Grill II Corp., was served on December 27, 2021. Service was completed for Ramon Guzman and Ali Ahmed on December 22, 2021, and service was completed for Tariq "Doe" on December 20, 2021.

This matter was filed pursuant to the Fair Labor Standards Act ("FLSA"). The plaintiff worked as a cashier for the Defendants. He was paid below the Federal minimum wage of \$15/hour, was paid in cash, and regularly worked more than 40 hours per week without receiving overtime or spread of hours payments. Further, plaintiff never received wage notices or wage statements as required by the New York Labor Law.

At this time, Plaintiff does not contemplate that any motions will be filed.

Very truly yours,
SACCO & FILLAS, LLP


Patricia R. Lynch, Esq.